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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

# JUDGE POLSTER

UNITED STATES OF AMERICA,

Plaintiff,

V.

JERIEKA WARD,

Defendant.

INDICTMENT

CR. NO.

1:06CR0208

Title 29, Sections 439(b) and  
501(c), United States Code

**MAG. JUDGE PERELMAN**

COUNT 1

The Grand Jury charges:

1. That all times hereinafter mentioned and within the meaning of Sections 3(I) and 3(j) of the Labor-Management Reporting and Disclosure Act of 1959, 29 U.S.C. §§ 402(I) and 402(j), hereinafter referred to as the Act:

(a) International Brotherhood of Electrical Workers, Local Union 998, hereinafter referred to as the Union, was and is a labor organization representing employees in an industry affecting commerce and has conducted and conducts its operations in Vermilion, Ohio, and maintained an office in Vermilion, Ohio.

(b) At all times relevant herein, the defendant, JERIEKA WARD, was the Treasurer of the Union and as such was an officer of a labor organization within the meaning of Section 3(f) of the Act [29 U.S.C. § 402(f)].

2. That from on or about March 19, 2001, through on or about November 10, 2003, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendant, JERIEKA WARD, did unlawfully and willfully embezzle, steal, and abstract and convert to her own use, and the use of others, approximately forty-six thousand seven hundred eight dollars and ninety-seven cents (\$46,708.97), which monies and funds belong to said Union;

All in violation of said Act, Title 29, Section 501(c), United States Code.

COUNT 2

The Grand Jury further charges:

1. Paragraphs 1 and 2 of Count 1 are incorporated as if fully realleged herein.
  2. From on or about June 30, 2001, through on or about June 30, 2003, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendant, JERIEKA WARD, did make and cause to be made false statements and representations of material facts knowing them to be false and knowingly failed to disclose material facts in reports and documents required to be filed by the Union with the Secretary of Labor pursuant to Section 431(b) of Title 29, United States Code, that is, the annual financial reports of the Union (known as LM-3s) failed to report that the defendant, JERIEKA WARD, received diverted dues checkoff
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payments and under reported the amount of money that the defendant, JERIEKA WARD, received as Treasurer of the Union.

All in violation of Title 29, United States Code, Section 439(b).

A TRUE BILL.

Original Document - - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.

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